

# EXHIBIT 4

## **NUSSBAUM LAW GROUP, P.C.**

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### **FIRM BIOGRAPHY**

Nussbaum Law Group, P.C. (“NLG”) is a boutique litigation firm specializing in the prosecution of fair competition and other complex class litigation. Linda Nussbaum, the firm’s founder, has been at the forefront of landmark antitrust cases for over 30 years. The firm’s experienced litigators have played leading roles in recovering billions of dollars for their clients from the world’s largest corporations. We have repeatedly successfully represented individuals, public companies and classes in significant multifaceted litigation in courts throughout the country. Our main practice areas include antitrust, consumer, data breach, and commodities class actions, as well as complex business disputes.

### **MANAGING DIRECTOR: LINDA P. NUSSBAUM**

Linda is the founder and managing director of the Nussbaum Law Group, P.C. She is nationally recognized for her representation of class and individual plaintiffs in antitrust, RICO, CEA, and pharmaceutical litigation. She has served as sole or co-lead counsel in many significant class actions which have resulted in substantial recoveries, many in the realm of hundreds of millions of dollars. Linda is currently serving as a court appointed class lead counsel in:

- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.)
- *In re Aluminum Warehousing Antitrust Litigation* (S.D.N.Y.)
- *In re Sensipar Antitrust Litigation* (D. Del.)
- *In re American Medical Collection Agency, Inc., Customer Data Security Breach Litigation* (D.N.J.)

She also represents large corporate clients pursuing direct actions in *In re Packaged Seafood Products Antitrust Litigation* (S.D. Cal.), *In re American Express Anti-Steering Rules Antitrust Litig.*, (E.D.N.Y.), and in an earlier phase of *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.).

Linda was selected “Litigator of the Week” by the AmLaw Litigation Daily on April 2, 2010 for her lead trial role in *Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals v. Pfizer*, where, after a five-week trial, a jury returned a RICO verdict for her clients. She was a finalist for Public Justice Foundation’s 2011 Trial Lawyer of the Year award. She has lectured extensively about antitrust and class action law, regularly moderating and participating in panel discussions at the annual American Antitrust Institute Private Enforcement Conference, the

annual American Bar Association, Section of Antitrust Law Spring Meeting, and other American Bar Association panels. She also has authored numerous publications.

Linda's successful prosecution of complex class litigation has been recognized and commended by judges in matters in which she has served as lead counsel.

Following a five-week jury trial in *In re Neurontin Marketing and Sales Practices Litigation*, in which Ms. Nussbaum served as co-lead trial counsel, No. 04-cv-10981 (D. Mass.), Judge Patti Saris commented that:

"[this was] a fabulous trial[.] [I]t's the kind of thing that you become a judge to sit on."

Chief Judge Hogan of the District of Columbia commented in *In re Lorazepam & Clorazepate Antitrust Litigation*, No. 99-cv-00276 (D.D.C.):

"Obviously, the skill of the attorneys, and I'm not going to spend the time reviewing it, I'm familiar with counsel, and they, as I said, are among the best antitrust litigators in the country."

From Judge Faith S. Hochberg of the District of New Jersey:

"[W]e sitting here don't get to see such fine lawyering, and it's really wonderful for me both to have tough issues and smart lawyers. On behalf of the entire federal judiciary I want to thank you for the kind of lawyering we wish everybody would do."

Linda received her B.A. (magna cum laude) from Brooklyn College, her J.D. (with honors) from the National Law Center, George Washington University Law School, and her L.L.M. in taxation from New York University Law School.

## OTHER NLG ATTORNEYS

Director **Bart Cohen** has over 25 years of experience in class actions and other complex litigation (including over 20 years with one of the nation's preeminent class action firms), with an emphasis on federal antitrust litigation.

Bart is currently representing plaintiffs in significant antitrust litigation, including *In re Payment Card Interchange and Merchant Discount Fee Antitrust Litigation* (E.D.N.Y.), and *In re Sensipar (Cinacalcet Hydrochloride Tablets) Antitrust Litigation* (D. Del.).

Bart's writing and editing as to antitrust issues has been published on Law360 and in several publications of the American Bar Association. His writing as to other issues has appeared in the Legal Intelligencer and publications of the Philadelphia Bar Association. He was rated as "a very strong litigator" in the Legal 500 in 2009 and 2010, and has been designated a "Pennsylvania Super Lawyer," a distinction awarded to only five percent of the attorneys in the state, in each of ten years.

Bart graduated from the University of Pennsylvania in 1984 with two degrees, from the Wharton School and the School of Engineering and Applied Science. He graduated in 1989 from the Georgetown University Law Center.

**Susan Schwaiger** is Of Counsel to Nussbaum Law Group. She practices in the area of antitrust and commodities litigation. She has litigated cases involving a wide variety of industries including banking and financial services, pharmaceuticals and chemicals. Susan, for the past 20 years, has played a significant role in major antitrust class actions in which Ms. Nussbaum served as lead counsel including:

- *In re Lorazepam & Clorazepate Antitrust Litigation* (D.D.C.)
- *In re Microcrystalline Cellulose Antitrust Litigation* (E.D. Pa.)
- *In re Plastics Additives Antitrust Litigation* (E.D. Pa.)
- *In re Foundry Resins Antitrust Litigation* (S.D. Ohio)
- *In re Rubber Chemicals Antitrust Litigation* (N.D. Cal.)

In addition, Susan has been involved in representing individual plaintiffs in *In re Payment Card Interchange Fee and Merchant Antitrust Litigation* (E.D.N.Y.), and *In re American Express Anti-Steering Rules Antitrust Litigation (No. II)* (E.D.N.Y.).

Susan graduated Cum Laude from Brooklyn Law School in 1992.

**Christopher Sanchez** is Of Counsel to Nussbaum Law Group. He has almost 20 years' experience representing consumers, businesses, investors and civil rights plaintiffs in class and impact litigation. Prior to joining Nussbaum Law Group, Christopher spent over 15 years as an associate and partner of a prominent boutique Chicago class action firm. He has also successfully represented New Mexico's public school districts and children in a landmark education civil rights case. Christopher practices in the areas of antitrust and consumer protection litigation.

Christopher is currently representing plaintiffs in *In re American Medical Collection Agency, Inc., Customer Data Security Breach Litigation* (D.N.J.). Additionally, Christopher has represented whistleblowers under the False Claims Act, and he successfully represented a woman from Guinea in her request for political asylum, prevailing in an immigration court trial.

Christopher obtained his law degree from DePaul University College of Law in 2000 and received a B.A. in political science from the University of New Mexico in 1996.

Senior Associate **Peter Moran** was previously an associate with an international law firm in New York City in its Global Competition and Commercial Litigation groups where he represented commercial clients on a variety of antitrust and complex commercial litigation issues, including violations of the federal and state antitrust and consumer protection laws, antitrust compliance, internal

investigations, individual civil and criminal liability and responding to federal and foreign regulators.

Peter has also represented pro bono clients before the New York Court of Appeals and Appellate Division, First Department and was a recipient of the 2011 Legal Aid Society Pro Bono Publico Award for outstanding service.

Peter focuses his practice on antitrust cases in the financial marketplace and pharmaceutical industry.

Peter received a BA in English from the State University of New York at Albany. He graduated cum laude from Brooklyn Law School in 2009, where he was a member of the Brooklyn Law School Journal of International Law and Moot Court Honor Society and recipient of several academic awards.

Associate **Marc E. Foto** began his career as an Assistant Attorney General in the Antitrust Bureau of the New York Attorney General. There, Marc's practice focused on representing New York in cartel and exclusionary conduct investigations.

Immediately prior to joining the firm, Marc was an associate with an international law firm in New York City in its Antitrust Litigation practice group. Marc represented clients in a variety of matters, including cartel investigations, violations of state and federal antitrust law, and responding to regulators in agency investigations.

Marc received an AB in Political Science and History from Colgate University. He graduated from Washington and Lee School of Law in 2016, where he was a member of the German Law Journal and the Moot Court team. He was a semifinalist in the Global Antitrust Institute's Appellate Advocacy Competition.

Associate **James Perelman** was associated with prominent plaintiffs' class action firms, specializing in pharmaceutical antitrust matters. Previously, he served as a Judicial Fellow in the Court of Common Pleas of Philadelphia County, Civil Trial Division. James is currently representing plaintiffs in *In Re: Marriott International, Inc., Customer Data Security Breach Litigation*, No. 19-md-02879 (D. Md.).

James received his J.D. in 2014 from Tulane University Law School, where he was the Business Editor of the Tulane Journal of International and Comparative Law. He received his B.A. in Politics from Brandeis University in 2010.

Associate **Brett Leopold** previously worked with other prominent plaintiffs' class action firms in New York on antitrust and data breach class litigation, including *In re: Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-02800 (N.G. Ga.). Brett's background, spanning twenty years in legal practice, includes complex commercial/securities fraud, toxic tort, commodities manipulation and pharmaceutical antitrust matters.

Brett graduated from St. John's University School of Law in 1995 and obtained a BA in political science from Emory University in 1992.

## NLG Nussbaum Law Group, P.C.

### LINDA P. NUSSBAUM

Linda Nussbaum is the founder and Managing Director of the Nussbaum Law Group, P.C. She has over 35 years of experience in prosecuting class actions and other complex litigation. She is nationally recognized for her representation of plaintiffs in antitrust, RICO, data breach, CEA and pharmaceutical litigation. She has served as sole or co-lead counsel in numerous class actions which have resulted in substantial recoveries, many in the hundreds of millions of dollars. She has also represented large public companies pursuing individual actions in *In re Packaged Seafood Products Antitrust Litigation* (S.D. Cal.), *In re American Express Anti-Steering Rules Antitrust Litig.* (E.D.N.Y.), and in the initial phase of *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.).

Ms. Nussbaum is currently serving as co-lead counsel in:

- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* (E.D.N.Y.)
- *In re Aluminum Warehousing Antitrust Litigation* (S.D.N.Y.)
- *In re Sensipar Antitrust Litigation* (D. Del.)
- *In re American Medical Collection Agency, Inc., Customer Data Security Breach Litigation* (D.N.J.)

Ms. Nussbaum also served as one of the class allocation counsel in *In re Foreign Exchange Benchmark Antitrust Litigation* (S.D.N.Y.), allocating a settlement over of two billion dollars, and serves on the Direct Purchaser Plaintiffs' Steering Committee in *In re Generic Pharmaceuticals Pricing Antitrust Litigation* (E.D. Pa.).

Ms. Nussbaum was selected "Litigator of the Week" by the AMLAW LITIGATION DAILY for her role as trial counsel in *Kaiser Foundation Health Plan, Inc. v. Pfizer* (D. Mass.). She was named as a finalist for Public Justice Foundation's 2011 Trial Lawyer of the Year Award. She has been listed on WHO'S WHO LEGAL: COMPETITION since 2016 ([www.WhosWhoLegal.com](http://www.WhosWhoLegal.com)), and is a lifetime member of the American Antitrust Institute (AAI) Advisory Board.

Ms. Nussbaum has lectured extensively about various aspects of antitrust and class action law, regularly moderating and participating in panel discussions at the annual American Antitrust Institute Private Enforcement Conference, the annual American Bar Association, Section of Antitrust Law Spring Meeting, and other American Bar Association panels. She has authored numerous publications.

Ms. Nussbaum's successful prosecution of complex litigation has been recognized and commended by judges in matters in which she has served as lead counsel. Chief Judge Hogan of the District of Columbia commented in *In re Lorazepam & Clorazepate Antitrust Litigation*, No. 99-cv-00276 (D.D.C.):

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**REPRESENTATIVE MULTIDISTRICT LITIGATION AND CLASS ACTION LEAD  
COUNSEL OR PLAINTIFFS' STEERING COMMITTEE APPOINTMENTS**

- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, 05-md-1720 (E.D.N.Y.) (co-lead)
- *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, 13-cv-07789 (S.D.N.Y.) (allocation counsel)
- *In re IV Saline Antitrust Litig.*, 16-cv-10584 (N.D. Ill.) (co-lead)
- *In re London Silver Fix Antitrust Litig.*, 14-md-02573 (S.D.N.Y.) (co-lead)
- *In re Puerto Rican Cabotage Antitrust Litig.*, MDL No. 1960, 08-md-01960 (D.P.R.) (co-lead)
- *In re Generic Pharmaceutical Pricing Antitrust Litig.*, 16-md-2724 (E.D. Pa.) (PSC)
- *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (PSC)
- *In re Actos Direct Purchaser Antitrust Litigation.*, 15-cv-3364 (S.D.N.Y.) (co-lead)
- *Meijer, Inc. v. Warner Chilcott Public Limited Company*, 12-cv-03824 (E.D. Pa.) (co-lead)
- *Meijer, Inc. v. Abbott Laboratories*, 07-cv-05985 (N.D. Cal.) (co-lead)
- *Meijer, Inc. v. Braintree Laboratories, Inc.*, 07-cv-00142 (D. Del.) (co-lead)
- *In re Metoprolol Succinate Direct Purchaser Antitrust Litig.*, MDL No. 1620, 06-cv-00052 (D. Del.); *Meijer, Inc., v. AstraZeneca* (co-lead)
- *In re DDAVP Direct Purchaser Antitrust Litig.*, 05-cv-02237 (S.D.N.Y.) (co-lead)
- *Meijer, Inc. v. Warner Chilcott Holdings Co. III, Ltd.* 05-cv-02195 (D.D.C.) (co-lead)
- *In re Children's Ibuprofen Oral Suspension Antitrust Litig.*, 04-mc-00535 (D.D.C.); *Meijer, Inc. v. Perrigo Company and Alparma Inc.* (D.D.C.) (lead counsel)
- *North Shore Hematology-Oncology Associates, P.C. v. Bristol-Myers Squibb Co.*, 04-cv-00248 (D.D.C.) (lead counsel) *In re Rubber Chemicals Antitrust Litig.*, 04-md-01648 (N.D. Cal.) (co-lead)
- *In re Foundry Resins Antitrust Litig.*, MDL No. 1638, 04-md-01638 (S.D. Ohio) (co-lead)
- *In re Plastics Additives Antitrust Litig.*, MDL No. 1684, 03-cv-02038 (E.D. Pa.) (co-lead)
- *In re Nifedipine Antitrust Litig.*, MDL No. 1515, 03-mc-00223 (D.D.C.) (co-lead)
- *In re Remeron Antitrust Litig.*, 03-cv-0085 (D.N.J.); *Meijer, Inc. v. Organon, Inc.* (co-lead)
- *In re Relafen Antitrust Litig.*, 01-cv-12239 (D. Mass.); *Meijer, Inc. v. SmithKline Beecham*, 01-cv-12239 (D. Mass.) (co-lead)
- *Oncology & Radiation Associates, P.A. v. Bristol-Myers Squibb Company & American Bioscience*, 01-cv-02313 (D.D.C.) (lead counsel)
- *In re Microcrystalline Cellulose Antitrust Litig.*, MDL No. 1402, 01-cv-00111 (E.D. Pa.) (co-lead)
- *In re Methionine Antitrust Litig.*, MDL No. 1311, 00-md-01311 (N.D. Cal.) (co-lead)
- *In re Sorbates Direct Purchaser Antitrust Litig.*, 98-cv-04886 (N.D. Cal.) (co-lead)
- *In re Lorazepam & Clorazepate Antitrust Litig.* MDL No. 1290, 99ms00276-TFH (D.D.C.) (co-lead)



## NLG

Nussbaum Law Group, P.C.

### EDUCATION

Brooklyn College, B.A., *magna cum laude* (1974)  
George Washington University, J.D. with honors  
(1977)  
New York University School of Law, LLM  
(1984)

### ADMISSIONS

New York, Second Department (1978)  
District of Columbia (2003)  
United States Supreme Court (1987)  
United States Court of Appeals for the First Circuit  
(2011)  
United States Court of Appeals for the Second  
Circuit (2007)  
United States Court of Appeals for the Ninth Circuit  
(2009)  
United States District Court for the Southern District  
of New York (1979)  
United States District Court for the Eastern District  
of New York (1979)  
United States District Court for the District of  
Columbia (2007)  
United States District Court for the Eastern District  
of Michigan (2009)

### OTHER PUBLICATIONS

*The Fifth Annual Future of Antitrust Enforcement Conference*, presented at the American Antitrust Institute's Fifth Annual Symposium on December 7, 2011.

*The Evolving Challenges of Class Certification*, presented at the American Antitrust Institute's Third Annual Symposium on Private Antitrust Enforcement on December 8, 2009.

*Daubert 15 Years Later: How Have Economists Fared?*, presented at the ABA Section of Antitrust Law Spring Meeting in March 2009.

*Where Do We Go Now? The Hatch-Waxman Act Twenty-Five Years Later: Successes, Failures and Prescriptions for the Future*, 41 RUTGERS LAW JOURNAL 299 (2009).